



**OREGON
DEPARTMENT OF
AGRICULTURE**

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To: Jonathan Sandau, Deputy Director, Oregon Department of Agriculture
Subject: Proposed Rulemaking - Hearing Officer's Report
From: Sunny Summers
Date: January 23, 2026

Rule Summary - The purpose of this rulemaking was to allow public comment on proposed updates to hemp rules.

Public Hearing - ODA held a public hearing on December 16, 2025. No comments were received.

SUMMARY OF COMMENTS - ODA accepted written testimony from the public through 5:00 p.m. on January 9, 2026. Those comments are below.

Dated this 23rd day of January 2026.

A handwritten signature in black ink, appearing to read "Sunny Summers".

Sunny Summers, Hearings Officer
Oregon Department of Agriculture
635 Capitol Street NE
Salem, OR 97301
sunny.summers@oda.oregon.gov
503.400.4196



Comments

Commenter	Comment	Response
Tammy S.	<p>I respectfully submit this public comment regarding OLCC hemp vendor license rules that prohibit licensed hemp vendors from participating in mobile markets and restrict sales to a permitted physical location only. I urge the OLCC to address the regulatory inequity between the alcohol industry and licensed hemp businesses, particularly as it applies to the mobile sale of ingested, non-adult hemp products. Disparate Treatment Without a Public Safety Basis Alcohol is an intoxicating, age-restricted substance with well-documented public health risks. Despite this, OLCC allows alcohol manufacturers and retailers to sell their products at farmers markets, festivals, and community events through temporary licensing and established compliance frameworks. In contrast, licensed hemp vendors selling non-adult, ingested hemp products—which are federally lawful, non-intoxicating when compliant, and already regulated for testing, labeling, and dosage—are categorically prohibited from participating in the same mobile markets. This disparity lacks a clear public safety justification. Unequal Regulatory Burden on Hemp Businesses By restricting hemp sales exclusively to fixed locations, OLCC imposes a</p>	<p>We appreciate your perspective on discrepancy between the OLCC's allowances for liquor licenses to sell their products outside of their licensed facilities under specific permits versus the ODA's restriction on vendor licenses only being allowed to sell out of their licensed facility. Unfortunately, this topic was not in the scope of this current rulemaking package. However, this topic is currently under consideration by the Hemp program. More discussion will occur prior to making a decision as to whether this idea will come to fruition at some point.</p>

higher operational burden on hemp businesses than on alcohol producers. This inequity disproportionately impacts small, local, and rural hemp companies that rely on mobile markets to reach consumers and compete fairly. Established Oversight Models Already Exist The OLCC already administers effective systems for alcohol sales at mobile venues, including event-specific permits, age verification, on-site compliance checks, and enforcement authority. These same mechanisms can be applied to ingested, non-adult hemp products, which present a lower risk profile than alcohol. Barrier to Market Access and Consumer Choice Prohibiting licensed hemp vendors from mobile markets limits lawful consumer access and stifles informed consumer choice, while simultaneously allowing alcohol—an adult-use intoxicant—to be sold in the same venues. Conclusion I respectfully request that the OLCC revise hemp vendor licensing rules to correct this inequitable treatment by allowing licensed hemp vendors to sell ingested, non-adult hemp products at mobile markets and temporary events, under clear and enforceable conditions comparable to those already used for alcohol. Regulatory fairness demands that non-intoxicating hemp products not be subject to more restrictive rules than intoxicating alcohol. Thank you for the opportunity to provide public comment and for your consideration of this issue.



Jeromy B.	<p>Total THC limit needs to be moved to 1% of total dry weight.</p>	<p>ODA is mindful of the challenge posed by the 0.3 percent total THC limit. While that is not a topic to this current rulemaking package, it is notable that a hemp license can apply for a certificate with the OLCC to transfer product up to 1 percent total THC into the recreational/adult use market.</p>
Tobias F.	<p>It is my wish as a hemp farmer and vendor that Oregon's current hemp laws stay in effect or even better go back towards a more generous THC limit and less burdensome regulations. Hemp can be a key part to Governor Kotek's new climate resiliency plan. We hemp farmers provide remediation for soils and the hydrologic cycle. We create habitat for animals, insects and avian species. Our crops draw down atmospheric CO₂ at a rate 4X greater than trees. Our crops provide food, fuel, fiber and medicine for a wide swath of consumers and industries and we've only just begun!</p> <p>You can't keep THC locked up in a box for greed alone. It just will never work. If you put all these farmers and vendors out of business you know where many will go. Banning hemp any further than you already have will just lead more farmers into the traditional unregulated markets. We have seen it all before.</p>	<p>The ODA Hemp program continually strives to take the least restrictive approach to balance our priorities: fostering a strong, innovative hemp industry, protecting the health and safety of Oregon consumers, and upholding regulations which hinder unlawful cannabis activity under the guise of "hemp". We must do so within the limitations and requirements of our state authority and federal regulations.</p> <p>We are keeping tabs on the legal landscape as it develops between now and November 2026, when changes to the Farm Bill and any related actions are anticipated to be enacted. As that unfolds, we will respond as best we can to support our licensees with fairness and sensitivity in all factors that we must take into consideration.</p>



<p>I personally have invested literally everything I have into my farm. I have worked my tail off since 2014 and then worked even harder when the Farm Bill was enacted. Now this? All the work I have done to the farm will be lost if there is no way to produce it legally. My chances of selling my property as a hemp production facility will be next to zero.</p> <p>The state of Oregon has already ruined the recreational marijuana industry by stopping issuance of licenses for micro-growers. As a grower of the cannabis plant I should be able to jump back and forth between the markets or grow both. I passed up my spot in the queue for a Rec license back in 2019 because I decided to put everything into the hemp business. Now it seems the rug has been pulled out from beneath me.</p> <p>I have dealt with so much uncertainty since the beginning. It has been a tough road with banking, credit card processing, shipping, ever-changing laws and regulatory burdens. I've lost money every year but kept on operating in hopes that things could only get better. It's been a roller coaster ride that most business owners and farmers could never even fathom and now this.</p>	
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	<p>Please consider rules and regulations that free up the amazing cannabis farmers in our great state. If the ban goes into effect or if Oregon makes it any harder then you've put a nail in the coffin for my farm and business. I and so many others had such high hopes for Oregon Grown Hemp. I really can't believe I am having to write this. I am pleading for you to stand up for Oregon hemp farms and the industry at large. Fight for rules based on science and sensibility. Banning hemp or putting further restrictions on it is just so wrong on so many levels.</p> <p>Protect the farmers, protect citizens rights and free up this plant and allow the people who put so much hard work in to prosper from it.</p>	
Joseph A.	<p>How about instead of trying to regulate a plant that needs to be dried and set on fire for it be considered "toxic" (not lethal), we regulate the packaging (childproof) and the point of sale (age restrictions for purchase)? Isn't the whole point to keep it out of the hands of kids? To collect maximum tax revenue? As a small farmer it's is the most asinine time/money/resource wasting endeavor to deal with the bs of tracking metrics that are of ZERO significant value to anyone other than the agent who needs to check their box to justify their job of walking around farms and wasting farmers time. This program of going after growers (who rebuilt this state after the timber</p>	<p>The ODA Hemp program continually strives to take the least restrictive approach to balance our priorities: fostering a strong, innovative hemp industry, protecting the health and safety of Oregon consumers, and upholding regulations which hinder unlawful cannabis activity under the guise of "hemp". We must do so within the limitations and requirements of our state authority and federal regulations.</p> <p>We are keeping tabs on the legal landscape as it develops between now and November 2026, when changes to the Farm Bill and any related actions are anticipated to be</p>



	<p>industry effectively died) is wasting farmers money, forcing families onto public assistance, and choking out of local communities and businesses. As an almost 30 year resident of this state I have watched us go from youthful vitality to stage4 cancer. It is killing Oregon. LET FARMERS FARM AND TAX THEIR REVENUE!!!! I'm not saying open the doors and let the cartels in. There's sensible paths where the state can keep track of who's growing what and where without interfering in businesses bottom line profits. The federal govt. is proxy for corporations and is stepping on Oregon's wallet. They do nothing for Oregon. Let's blaze a new path and set the standard for sensible regulation with or without the feds.</p>	<p>enacted. As that unfolds, we will respond as best we can to support our licensees with fairness and sensitivity in all factors that we must take into consideration.</p>
Albert N.	<p>There needs to be a 2 mile setback from construction of housing</p> <p>We had a hemp grow out side Molalla beside a nice neighborhood with kids they could not even stay out side and the smell got into their homes. Also a lady had to go to the ER because of it. Also we had a growing on Vick rd Molalla that the OLCC said was illegal so they said they informed the authorities Clackamas County they said they didn't have the resources to look into it.</p>	<p>These concerns are unfortunately, not within the authority or jurisdiction of the ODA. Specific notes regarding that are below.</p> <ul style="list-style-type: none"> - Regarding your proposal for a 2-mile setback from housing, this is not within the authority of the ODA but rather is up to the local governing body (County or City) to determine. - The ODA does not have authority over unlicensed grows. When we learn of such, we make referrals to local law enforcement agencies, as only they have the authority and jurisdiction over unlicensed grows. It is up to each law enforcement agency to determine where and how they might best utilize their limited resources.



Stan D.	<p>Thank you for the opportunity to provide public comment on the proposed amendments to OAR Chapter 603, Division 048 governing Oregon's industrial hemp program.</p> <p>I am submitting these comments as a licensed hemp grower / handler / landowner engaged in Oregon's hemp sector, with a focus on practical compliance, economic viability, and regulatory clarity. My operation is based in Marion County / I have operated under ODA licensure since 2018 I work directly with multiple licensed operators across the state. Like many operators, I am committed to operating within a strong, science-based regulatory framework that protects public interests while remaining workable for agricultural producers and small-to mid-scale businesses.</p> <p>I recognize the Department's responsibility to implement statutory mandates under ORS 571.260-571.348 and appreciate the complexity of administering a program that sits at the intersection of agriculture, land use, testing, and enforcement. Oregon's hemp sector depends on rules that are clear, predictable, and aligned with both statutory authority and real-world agricultural practices. Where ambiguity exists, it can create compliance risk not only for licensees, but also for the Department's inspectors and enforcement staff.</p>	<p>It is important to us that all licensees and potential licensees understand the requirements and how to comply. To help us better understand and address your concerns, please review the notes below and provide specific questions for each point listed.</p> <ul style="list-style-type: none"> ○ We are diligently working to identify definitions which need clarification. Please contact hemp@oda.oregon.gov to specify definitions which you believe need further clarification, providing specific questions to be answered by a revision. ○ More information is needed to ensure that we understand what needs to change or be clarified about LUCS requirements. Please send specific questions to be addressed to hemp@oda.oregon.gov . ○ Please send specific questions regarding requirements and enforcement to hemp@oda.oregon.gov . ○ Please send specific questions regarding unclear standards or timelines to hemp@oda.oregon.gov . ○ Please send specific questions to be addressed to hemp@oda.oregon.gov .
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<p>As drafted, many of the proposed amendments move the program toward greater structure and consistency. However, several provisions would benefit from clarification to avoid unintended consequences, inconsistent application, or unnecessary compliance burdens, particularly for farmers and operators acting in good faith. In particular, these comments focus on:</p> <ul style="list-style-type: none"> • Definitions that trigger licensure, testing, or enforcement obligations, where precision is essential to avoid jurisdictional overlap or misclassification of routine agricultural activities; • Land Use Compatibility Statement (LUCS) requirements, where greater clarity around notice, timing, and interim operations would improve predictability without limiting ODA's authority; • Grower and handler endorsements, where overlapping requirements from multiple regulatory regimes warrant clearer guidance on applicability and enforcement; • Pre-registration violations and corrective action, where transparency around standards and timelines would support compliance and fair administration; and • Coordination with OLCC requirements, particularly where licensees are subject to both ODA licensure and downstream registry or tracking obligations. 	
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	<p>Thank you for considering these comments as part of the rulemaking record. I appreciate the Department's continued engagement with stakeholders and welcome ongoing dialogue as the Hemp Program moves forward.</p>	
Jonathan C.	<p>I am submitting this public comment regarding the proposed updates to Oregon's hemp rules. I appreciate the opportunity to participate in the rulemaking process and the agencies' stated goal of regulatory clarity. However, I am deeply concerned that the cumulative effect of these proposed changes will make it economically unviable for small, owner-operated hemp businesses like mine to continue operating in Oregon.</p> <p>I operate a small Oregon-based company producing CBD-rich oil tinctures and hemp-derived essential oils (terpenes) under Octo Consulting LLC. We have operated in compliance with Oregon's hemp rules for over five years. Under the existing framework, we have met all licensing, testing, labeling, and recordkeeping requirements and have built a responsible, transparent business.</p> <p>---</p> <p>### Declining Participation in Oregon's Hemp Program</p> <p>Oregon's hemp cultivation and processing sectors have contracted sharply since the industry's peak. In 2019,</p>	<p>It is important to us that all licensees and potential licensees understand the requirements and how to comply. To help us better understand and address your concerns, please review the notes below and provide specific questions for each point listed.</p> <ul style="list-style-type: none"> ○ We are diligently working to identify definitions which need clarification. Please contact hemp@oda.oregon.gov to specify definitions which you believe need further clarification, providing specific questions to be answered by a revision. ○ More information is needed to ensure that we understand what needs to change or be clarified about LUCS requirements. Please send specific questions to be addressed to hemp@oda.oregon.gov . ○ Please send specific questions regarding requirements and enforcement to hemp@oda.oregon.gov . ○ Please send specific questions regarding unclear standards or timelines to hemp@oda.oregon.gov .



<p>Oregon had approximately 1,967 hemp growers, 6,040 grow sites, and 598 handlers (processors) licensed, with over 64,000 total acres licensed for hemp cultivation. By 2024, those figures had declined significantly to 178 growers, 182 grow sites, and 199 handlers, and total licensed acreage fell to roughly 1,394 acres. These data show a dramatic contraction in producer and handler participation over the past several years.</p> <p>This ongoing decline reflects real economic stresses on the hemp sector. A reduction of more than 95% in total licensed acreage since 2019 suggests that farmers, processors, and service providers are exiting the industry, choosing not to expand or relocating to more hemp friendly states.</p> <p>When Oregon's hemp program was first established, farmers and processors felt supported by the ODA in building a new agricultural and manufacturing sector. That early support helped create compliance-focused businesses and a functioning supply chain. The current direction of regulation, however, appears to move away from that collaborative model and toward increasing complexity and cost at a time when the industry is already contracting rather than expanding.</p> <p>---</p>	<p>Please send specific questions to be addressed to hemp@oda.oregon.gov .</p>
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<p>### Disproportionate Impact on Small Businesses</p> <p>While individual rule changes may appear modest in isolation, their combined impact – increased licensing costs, expanded recordkeeping, enhanced testing requirements, and additional labeling and registration obligations – represents a substantial operational burden for small businesses with limited staff and tight margins. These costs are not theoretical; they translate directly into administrative labor, professional services, packaging redesign, and delayed or unsellable inventory.</p> <p>If other products regulated by the ODA – such as small food producers, specialty agriculture operations, or value-added farm products – were subjected to the same level of ongoing compliance, documentation, and labeling complexity now being proposed for hemp, those industries would not tolerate it. Hemp businesses should not be regulated more stringently than comparable agricultural or consumer packaged goods simply because the product contains cannabinoids that are federally legal.</p> <p>---</p> <p>### Federal Legality and the Need for Regulatory Alignment</p> <p>Hemp and hemp-derived cannabinoids are federally legal under the 2018 Farm Bill. Oregon's hemp industry has operated for years under this federal framework, and</p>	
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	<p>many businesses – including mine – rely on federal definitions and guidance to operate across state lines.</p> <p>The increasing divergence between Oregon's rules and federal hemp guidance creates unnecessary complexity, confusion, and risk for compliant businesses. Constantly changing state-specific requirements make long-term planning nearly impossible and discourage investment. Aligning Oregon's hemp regulations more closely with stable federal standards would promote clarity, consistency, and fairness while still protecting public health.</p> <p>---</p> <p>### Competitive Disadvantage Compared to Other States</p> <p>Oregon is no longer competing in a vacuum. Many other states have adopted hemp regulatory frameworks that are significantly more predictable, affordable, and business-friendly while still ensuring safety and transparency. As Oregon's regulatory burden increases, small businesses are increasingly incentivized to relocate operations, manufacturing, or investment to states with clearer and less punitive compliance structures.</p> <p>If these proposed rules move forward as written, Oregon risks losing compliant hemp businesses – not because they are unsafe or irresponsible, but because the cost of</p>
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doing business here becomes untenable.

Concerns Regarding Regulatory Balance Between Hemp and Marijuana

I am also concerned by the growing regulatory imbalance between Oregon's federally legal hemp industry and its state-legal but federally illegal marijuana industry. From the perspective of small hemp operators, recent regulatory actions by the OLCC appear increasingly restrictive toward hemp while simultaneously protecting the established marijuana market, which represents a significant source of state revenue.

Whether intentional or not, this dynamic creates the perception that hemp is being regulated out of competitiveness to insulate marijuana businesses from market overlap. This approach risks undermining a federally legal agricultural industry in favor of protecting another, rather than allowing both industries to coexist under fair, risk-based rules.

Need for a Tiered or Small-Business Exemption Model

To address these concerns constructively, I respectfully urge the agencies to consider a tiered regulatory framework that reflects the realities of small, owner-operated businesses. For example:



- Businesses under a defined annual revenue threshold (such as \$1 million in gross sales) could be exempt from certain administrative, labeling, or registration requirements.
- Reduced fees, simplified reporting, or extended compliance timelines could apply to small producers.
- Larger, vertically integrated, or high-volume operators could remain subject to more extensive requirements.

This approach is common across other regulated industries and would allow regulators to focus oversight where risk is highest, while preserving the viability of small, compliant businesses that pose minimal risk.

Conclusion

I support reasonable, science-based regulation of hemp products. However, the current direction of Oregon's hemp rules – combined with rising costs, declining participation, and increasing regulatory complexity – threatens to eliminate small businesses that have operated responsibly for years.

I respectfully request that the ODA and OLCC reconsider these changes, prioritize alignment with federal hemp standards, and adopt a tiered approach that preserves



	<p>small businesses while maintaining public confidence and safety.</p> <p>Thank you for your time, consideration, and willingness to hear from those directly impacted by these decisions.</p>	
Conor D.	<p>Thank you for the opportunity to provide public comment on the proposed amendments to OAR Chapter 603, Division 048 governing Oregon's industrial hemp program.</p> <p>I am submitting these comments as a licensed handler and manufacturer, engaged in Oregon's hemp sector, with a focus on practical compliance, economic viability, and regulatory clarity. Our company is based out of Springfield, in Lane County. Like many operators, I am committed to operating within a strong, science-based regulatory framework that protects public interests while remaining workable for agricultural producers and small-to mid-scale businesses.</p> <p>I recognize the Department's responsibility to implement statutory mandates under ORS 571.260-571.348 and appreciate the complexity of administering a program that sits at the intersection of agriculture, land use, testing, and enforcement. Oregon's hemp sector depends on rules that are clear, predictable, and aligned with both statutory authority and real-world agricultural practices. Where</p>	<p>It is important to us that all licensees and potential licensees understand the requirements and how to comply. To help us better understand and address your concerns, please review the notes below and provide specific questions for each point listed.</p> <ul style="list-style-type: none"> ○ We are diligently working to identify definitions which need clarification. Please contact hemp@oda.oregon.gov to specify definitions which you believe need further clarification, providing specific questions to be answered by a revision. ○ More information is needed to ensure that we understand what needs to change or be clarified about LUCS requirements. Please send specific questions to be addressed to hemp@oda.oregon.gov . ○ Please send specific questions regarding requirements and enforcement to hemp@oda.oregon.gov . ○ Please send specific questions regarding unclear standards or timelines to hemp@oda.oregon.gov .



<p>ambiguity exists, it can create compliance risk not only for licensees, but also for the Department's inspectors and enforcement staff.</p> <p>As drafted, many of the proposed amendments move the program toward greater structure and consistency. However, several provisions would benefit from clarification to avoid unintended consequences, inconsistent application, or unnecessary compliance burdens, particularly for farmers and operators acting in good faith. In particular, these comments focus on:</p> <ul style="list-style-type: none"> • Definitions that trigger licensure, testing, or enforcement obligations, where precision is essential to avoid jurisdictional overlap or misclassification of routine agricultural activities; • Land Use Compatibility Statement (LUCS) requirements, where greater clarity around notice, timing, and interim operations would improve predictability without limiting ODA's authority; • Grower and handler endorsements, where overlapping requirements from multiple regulatory regimes warrant clearer guidance on applicability and enforcement; • Pre-registration violations and corrective action, where transparency around standards and timelines would support compliance and fair administration; and 	<p>Please send specific questions to be addressed to hemp@oda.oregon.gov .</p>
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Meerilyn J.	<p>Thank you for the opportunity to provide public comment on the proposed amendments to OAR Chapter 603, Division 048 governing Oregon's industrial hemp program.</p> <p>I am submitting these comments as a manufacturer of topicals engaged in Oregon's hemp sector, with a focus on practical compliance, economic viability, and regulatory clarity. Our operation is based in Douglas County and I have operated under my ODA licensure(AG-R1062747IHH since 2019, process and manufacturer topicals. Like many operators, I am committed to operating within a strong, science-based regulatory framework that protects public interests while remaining workable for agricultural producers and small- to mid-scale businesses.</p> <p>I recognize the Department's responsibility to implement statutory mandates under ORS 571.260–571.348 and appreciate the complexity of administering a program that sits at the intersection of agriculture, land use, testing,</p>	<p>It is important to us that all licensees and potential licensees understand the requirements and how to comply. To help us better understand and address your concerns, please review the notes below and provide specific questions for each point listed.</p> <ul style="list-style-type: none"> ○ We are diligently working to identify definitions which need clarification. Please contact hemp@oda.oregon.gov to specify definitions which you believe need further clarification, providing specific questions to be answered by a revision. ○ More information is needed to ensure that we understand what needs to change or be clarified about LUCS requirements. Please send specific questions to be addressed to hemp@oda.oregon.gov . ○ Please send specific questions regarding requirements and enforcement to hemp@oda.oregon.gov .



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Tucker P.	<p>Thank you for the opportunity to provide public comment on the proposed amendments to OAR Chapter 603, Division 048 governing Oregon's industrial hemp program.</p> <p>I am submitting these comments as a licensed hemp vendor engaged in Oregon's hemp sector, with a focus on practical compliance, economic viability, and regulatory clarity. My operation is based in Jackson County. I have operated under ODA licensure since 2021. I work directly with multiple licensed operators across the state. Like many operators, I am committed to operating within a</p>	<p>It is important to us that all licensees and potential licensees understand the requirements and how to comply. To help us better understand and address your concerns, please review the notes below and provide specific questions for each point listed.</p> <ul style="list-style-type: none"> ○ We are diligently working to identify definitions which need clarification. Please contact hemp@oda.oregon.gov to specify definitions which you believe need further clarification, providing specific questions to be answered by a revision. ○ More information is needed to ensure that we understand what needs to change or be clarified about LUCS



<p>strong, science-based regulatory framework that protects public interests while remaining workable for agricultural producers and small- to mid-scale businesses.</p> <p>I recognize the Department's responsibility to implement statutory mandates under ORS 571.260–571.348 and appreciate the complexity of administering a program that sits at the intersection of agriculture, land use, testing, and enforcement. Oregon's hemp sector depends on rules that are clear, predictable, and aligned with both statutory authority and real-world agricultural practices. Where ambiguity exists, it can create compliance risk not only for licensees, but also for the Department's inspectors and enforcement staff.</p> <p>As drafted, many of the proposed amendments move the program toward greater structure and consistency. However, several provisions would benefit from clarification to avoid unintended consequences, inconsistent application, or unnecessary compliance burdens, particularly for farmers and operators acting in good faith. In particular, these comments focus on:</p> <ul style="list-style-type: none"> ○ Definitions that trigger licensure, testing, or enforcement obligations, where precision is essential to avoid jurisdictional overlap or misclassification of routine agricultural activities; 	<p>requirements. Please send specific questions to be addressed to hemp@oda.oregon.gov .</p> <ul style="list-style-type: none"> ○ Please send specific questions regarding requirements and enforcement to hemp@oda.oregon.gov . ○ Please send specific questions regarding unclear standards or timelines to hemp@oda.oregon.gov . <p>Please send specific questions to be addressed to hemp@oda.oregon.gov .</p>
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Kelley T.	<p>Thank you for the opportunity to provide public comment on the proposed amendments to OAR Chapter 603, Division 048 governing Oregon's industrial hemp program.</p> <p>I am submitting these comments as a licensed hemp grower, handler and landowner engaged in Oregon's hemp</p>	<p>It is important to us that all licensees and potential licensees understand the requirements and how to comply. To help us better understand and address your concerns, please review the notes below and provide specific questions for each point listed.</p>



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Mike and Terry C.	We are currently on holiday until January 3rd. Given that this is a significant topic for us hemp farmers and we are all just returning from the break, a 48-hour response time	Thank you for your comment. ODA extended the comment period until 5:00 pm on January 9, 2026.



	<p>is not feasible.</p> <p>Terry and I have reviewed Ms. Wagner's request, and we would like to ask if you could consider a 30-day window for us to provide a collective response.</p>	
Mason W.	<p>Thank you for the opportunity to provide public comment on the proposed amendments to OAR Chapter 603, Division 048 governing Oregon's industrial hemp program.</p> <p>I am submitting these comments as a longtime licensed hemp grower and handler engaged in Oregon's hemp sector, with a focus on practical compliance, economic viability, and regulatory clarity. My company, East Fork Cultivars, has operations in Josephine and Multnomah Counties and has been licensed since 2018. Like many operators, I am committed to operating within a strong, science-based regulatory framework that protects public interests while remaining workable for agricultural producers and small- to mid-scale businesses.</p> <p>I recognize the Department's responsibility to implement statutory mandates under ORS 571.260-571.348 and appreciate the complexity of administering a program that sits at the intersection of agriculture, land use, testing, and enforcement. Oregon's hemp sector depends on rules that are clear, predictable, and aligned with both statutory</p>	<p>It is important to us that all licensees and potential licensees understand the requirements and how to comply. To help us better understand and address your concerns, please review the notes below and provide specific questions for each point listed.</p> <ul style="list-style-type: none"> ○ We are diligently working to identify definitions which need clarification. Please contact hemp@oda.oregon.gov to specify definitions which you believe need further clarification, providing specific questions to be answered by a revision. ○ More information is needed to ensure that we understand what needs to change or be clarified about LUCS requirements. Please send specific questions to be addressed to hemp@oda.oregon.gov . ○ Please send specific questions regarding requirements and enforcement to hemp@oda.oregon.gov . ○ Please send specific questions regarding unclear standards or timelines to hemp@oda.oregon.gov .



<p>authority and real-world agricultural practices. Where ambiguity exists, it can create compliance risk not only for licensees, but also for the Department's inspectors and enforcement staff.</p> <p>As drafted, many of the proposed amendments move the program toward greater structure and consistency. However, several provisions would benefit from clarification to avoid unintended consequences, inconsistent application, or unnecessary compliance burdens, particularly for farmers and operators acting in good faith. In particular, these comments focus on:</p> <ul style="list-style-type: none"> ○ Definitions that trigger licensure, testing, or enforcement obligations, where precision is essential to avoid jurisdictional overlap or misclassification of routine agricultural activities; ○ Land Use Compatibility Statement (LUCS) requirements, where greater clarity around notice, timing, and interim operations would improve predictability without limiting ODA's authority; ○ Grower and handler endorsements, where overlapping requirements from multiple regulatory regimes warrant clearer guidance on applicability and enforcement; 	<p>Please send specific questions to be addressed to hemp@oda.oregon.gov .</p>
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	<ul style="list-style-type: none"> ○ Pre-registration violations and corrective action, where transparency around standards and timelines would support compliance and fair administration; and ○ Coordination with OLCC requirements, particularly where licensees are subject to both ODA licensure and downstream registry or tracking obligations. <p>Thank you for considering these comments as part of the rulemaking record. I appreciate the Department's continued engagement with stakeholders and welcome ongoing dialogue as the Hemp Program moves forward.</p>	
Megan W.	<p>On behalf of the Oregon Healthy Alternatives Association (ORHAA), please accept the attached written comments regarding the Oregon Department of Agriculture's proposed amendments to OAR Chapter 603, Division 048 (Industrial Hemp Rules).</p> <p>These comments are submitted on behalf of ORHAA's Executive Directors, Paige Brown and Drew Hull, and reflect input from hemp farmers, processors, handlers, and related operators across Oregon. ORHAA appreciates the opportunity to participate in this rulemaking process and recognizes the Department's responsibility to implement statutory requirements while administering a workable and enforceable regulatory framework.</p>	<p>It is important to us that all licensees and potential licensees understand the requirements and how to comply. To help us better understand and address your concerns, please review the notes below and provide specific questions for each point listed.</p> <ul style="list-style-type: none"> ○ We are diligently working to identify definitions which need clarification. Please contact hemp@oda.oregon.gov to specify definitions which you believe need further clarification, providing specific questions to be answered by a revision. ○ More information is needed to ensure that we understand what needs to change or be clarified about LUCS requirements. Please send specific questions to be addressed to hemp@oda.oregon.gov .



<p>Our comments are intended to be constructive and responsive to the proposed rule language, with a focus on operational feasibility, regulatory clarity, and unintended compliance impacts - particularly for small and mid-scale operators working in good faith to remain compliant.</p> <p>Thank you for your consideration of these comments and for your continued engagement with stakeholders throughout this process. Please do not hesitate to contact us if additional information or clarification would be helpful.</p> <p>On behalf of the Oregon Healthy Alternatives Association (ORHAA), thank you for the opportunity to provide comments on the proposed amendments to OAR Chapter 603, Division 048 governing Oregon's industrial hemp program.</p> <p>ORHAA represents hemp farmers, processors, handlers, and related operators across Oregon, with a focus on practical compliance, economic viability, and regulatory clarity. I am committed to advancing a strong, science-based regulatory framework that protects public interests while remaining workable for agricultural producers and small- to mid-scale businesses.</p> <p>We recognize the Department's responsibility to implement statutory mandates under ORS 571.260-</p>	<ul style="list-style-type: none"> ○ Please send specific questions regarding requirements and enforcement to hemp@oda.oregon.gov . ○ Please send specific questions regarding unclear standards or timelines to hemp@oda.oregon.gov . <p>Please send specific questions to be addressed to hemp@oda.oregon.gov.</p>
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<p>571.348 and appreciate the complexity of administering a program that sits at the intersection of agriculture, land use, testing, and enforcement. Oregon's hemp sector depends on rules that are clear, predictable, and aligned with both statutory authority and real-world agricultural practices. Where ambiguity exists, it can create compliance risk not only for licensees, but also for the Department's inspectors and enforcement staff.</p> <p>As drafted, many of the proposed amendments move the program toward greater structure and consistency. However, several provisions would benefit from clarification to avoid unintended consequences, inconsistent application, or unnecessary compliance burdens, particularly for farmers and operators acting in good faith. In particular, our comments focus on:</p> <ul style="list-style-type: none"> ○ Definitions that trigger licensure, testing, or enforcement obligations, where precision is essential to avoid jurisdictional overlap or misclassification of routine agricultural activities; ○ Land Use Compatibility Statement (LUCS) requirements, where greater clarity around notice, timing, and interim operations would improve predictability without limiting ODA's authority; ○ Grower and handler endorsements, where overlapping requirements from multiple regulatory 	
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	<p>regimes warrant clearer guidance on applicability and enforcement;</p> <ul style="list-style-type: none"> ○ Pre-registration violations and corrective action, where transparency around standards and timelines would support compliance and fair administration; and ○ Coordination with OLCC requirements, particularly where licensees are subject to both ODA licensure and downstream registry or tracking obligations. <p>Our intent is not to weaken enforcement or expand ODA's statutory authority, but to ensure that the rules as implemented are administrable, proportionate, and aligned with the realities of agricultural production and handling. Clear standards benefit everyone: growers and handlers can comply with confidence, inspectors can apply rules consistently, and the Department can focus its resources where they matter most.</p> <p>We respectfully ask the Department to consider these comments as part of the rulemaking record and welcome continued dialogue as the Hemp Program moves forward. ORHAA and its members remain available to provide additional context, data, or stakeholder feedback that may assist the Department in finalizing these rules.</p> <p>Thank you for your time, attention, and continued engagement with Oregon's hemp community.</p>	
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Chris S.	<p>Thank you for the opportunity to provide public comment on the proposed amendments to OAR Chapter 603, Division 048 governing Oregon's industrial hemp program.</p> <p>I am submitting these comments as a licensed hemp grower engaged in Oregon's hemp sector, with a focus on practical compliance, economic viability, and regulatory clarity. My operation is based in Josephine County I have operated under ODA licensure since 2018 and I work directly with multiple licensed operators across the state. Like many operators, I am committed to operating within a strong, science-based regulatory framework that protects public interests while remaining workable for agricultural producers and small- to mid-scale businesses.</p> <p>I recognize the Department's responsibility to implement statutory mandates under ORS 571.260–571.348 and appreciate the complexity of administering a program that sits at the intersection of agriculture, land use, testing, and enforcement. Oregon's hemp sector depends on rules that are clear, predictable, and aligned with both statutory authority and real-world agricultural practices. Where ambiguity exists, it can create compliance risk not only for licensees, but also for the Department's inspectors and enforcement staff.</p>	<p>It is important to us that all licensees and potential licensees understand the requirements and how to comply. To help us better understand and address your concerns, please review the notes below and provide specific questions for each point listed.</p> <ul style="list-style-type: none"> ○ We are diligently working to identify definitions which need clarification. Please contact hemp@oda.oregon.gov to specify definitions which you believe need further clarification, providing specific questions to be answered by a revision. ○ More information is needed to ensure that we understand what needs to change or be clarified about LUCS requirements. Please send specific questions to be addressed to hemp@oda.oregon.gov . ○ Please send specific questions regarding requirements and enforcement to hemp@oda.oregon.gov . ○ Please send specific questions regarding unclear standards or timelines to hemp@oda.oregon.gov . <p>Please send specific questions to be addressed to hemp@oda.oregon.gov .</p>
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<p>As drafted, many of the proposed amendments move the program toward greater structure and consistency. However, several provisions would benefit from clarification to avoid unintended consequences, inconsistent application, or unnecessary compliance burdens, particularly for farmers and operators acting in good faith. In particular, these comments focus on:</p> <ul style="list-style-type: none"> ● Definitions that trigger licensure, testing, or enforcement obligations, where precision is essential to avoid jurisdictional overlap or misclassification of routine agricultural activities; ● Land Use Compatibility Statement (LUCS) requirements, where greater clarity around notice, timing, and interim operations would improve predictability without limiting ODA's authority; ● Grower and handler endorsements, where overlapping requirements from multiple regulatory regimes warrant clearer guidance on applicability and enforcement; ● Pre-registration violations and corrective action, where transparency around standards and timelines would support compliance and fair administration; and ● Coordination with OLCC requirements, particularly where licensees are subject to both ODA licensure and downstream registry or tracking obligations. <p>Thank you for</p>	
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	<p>considering these comments as part of the rulemaking record. I appreciate the Department's continued engagement with stakeholders and welcome ongoing dialogue as the Hemp Program moves forward.</p>	
Chrissy W.	<p>As an employee at a licensed hemp handling business, I appreciate the Department's effort to clarify definitions, align hemp oversight with OLCC standards (where appropriate), and improve traceability and consumer protection. Clearer distinctions between hemp, hemp products, and marijuana are helpful and largely supported.</p> <p>That said, several of the proposed changes raise concerns for small to mid-size hemp handling operations:</p> <p>Endorsements and LUCS requirements</p> <p>Requiring endorsements tied to LUCS approvals and certificates of occupancy adds significant cost, time, and uncertainty. Small businesses often do not have in-house compliance staff or legal support, and navigating LUCS approvals, certificates of occupancy, and endorsement-specific inspections—especially in jurisdictions unfamiliar with hemp—presents real barriers for small businesses. Many handlers already operate safely and compliantly under existing approvals. The Department may wish to consider grandfathering existing licensees or establishing</p>	<p>It is important to us that all licensees and potential licensees understand the requirements and how to comply. To help us better understand and address your concerns, please review the notes below and provide specific questions for each point listed.</p> <ul style="list-style-type: none"> ○ We are diligently working to identify definitions which need clarification. Please contact hemp@oda.oregon.gov to specify definitions which you believe need further clarification, providing specific questions to be answered by a revision. ○ Regarding endorsements and LUCS requirements, the new LUCS form is to be implemented for licenses not yet issued upon effective date of the new rules and upon renewal of existing licenses for the 2027 licensing period. It will continue to be only one LUCS form, modified to simply check the corresponding boxes. There will be no additional cost for endorsements beyond the cost of a new LUCS when/if changes to the operation or location of a business would otherwise require a new LUCS. This is to support safety for all handler licenses. Many jurisdictions are not aware of what type of activities occur which their handler sites, thus without that knowledge might miss where such activities might require specific safety measures prior to their approval.



<p>a streamlined pathway for handlers that are not materially changing their operations.</p> <p>One-site-one-license restriction</p> <p>Prohibiting the relocation of handling sites and requiring separate licenses for each site reduces operational flexibility that many small businesses rely on to survive. This may disproportionately impact small businesses that utilize shared production spaces and seasonal or rural operations. Greater flexibility here would better reflect how hemp products are actually manufactured while maintaining oversight.</p> <p>Overlap with OLCC standards</p> <p>While alignment with OLCC rules can improve consistency, hemp handlers should not be regulated as marijuana processors. Hemp products operate under different markets, margins, and risk profiles. Any imported OLCC requirements should be clearly justified and tailored to hemp.</p> <p>Clarity and consistency</p> <p>Several definitions and sections appear to be duplicative or inconsistent which creates uncertainty about which subsection controls for compliance and enforcement purposes, thus increasing the risk of unintentional</p>	<ul style="list-style-type: none"> ○ Regarding one-site-one-license, this has been an existing rule – not subject to change in this amendment package. It is important to license each site individually, to ensure that each site is inspected and evaluated to meet standards. ○ Regarding your comment about differences between what should be required of hemp handlers vs marijuana processors, please send specific questions or suggestions pertaining to what requirements you wish to have considered differently. Please send specific questions regarding unclear standards or timelines to hemp@oda.oregon.gov. <p>Please send specific questions about clarity and consistency to hemp@oda.oregon.gov.</p>
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	<p>violations. Clarifying and consolidating these sections, and finalizing subsection numbering prior to adoption, would help licensees-especially small businesses.</p> <p>While many of these concepts are already present in the current OAR 603-048 framework, the proposed amendments, when considered together, further formalize and expand those requirements in ways that may increase the compliance burden for small, otherwise compliant licensees. I appreciate the Department's ongoing efforts to strengthen consumer safety, transparency, and regulatory clarity, and I respectfully encourage continued consideration of the day-to-day realities of hemp handling operations. Clear transition periods and appropriately scaled requirements would help support successful compliance while ensuring that hemp businesses are not subject to marijuana-equivalent regulatory burdens unless clearly warranted.</p> <p>Thank you for the opportunity to comment and for continued engagement with the hemp industry.</p>	
Ron S.	Thank you for the opportunity to provide public comment on the proposed amendments to OAR Chapter 603,	It is important to us that all licensees and potential licensees understand the requirements and how to comply. To help us better understand and address your



<p>Division 048 governing Oregon's industrial hemp program.</p> <p>I am submitting these comments as a licensed hemp grower, land owner, and hemp user engaged in Oregon's hemp sector, with a focus on practical compliance, economic viability, and regulatory clarity. Our farm is in Josephine County and we have been under ODA license since 2019. Like many operators, I am committed to operating within a strong, science-based regulatory framework that protects public interests while remaining workable for agricultural producers and small- to mid-scale businesses.</p> <p>I recognize the Department's responsibility to implement statutory mandates under ORS 571.260–571.348 and appreciate the complexity of administering a program that sits at the intersection of agriculture, land use, testing, and enforcement. Oregon's hemp sector depends on rules that are clear, predictable, and aligned with both statutory authority and real-world agricultural practices. Where ambiguity exists, it can create compliance risk not only for licensees, but also for the Department's inspectors and enforcement staff.</p> <p>As drafted, many of the proposed amendments move the program toward greater structure and consistency.</p>	<p>concerns, please review the notes below and provide specific questions for each point listed.</p> <ul style="list-style-type: none"> ○ We are diligently working to identify definitions which need clarification. Please contact hemp@oda.oregon.gov to specify definitions which you believe need further clarification, providing specific questions to be answered by a revision. ○ More information is needed to ensure that we understand what needs to change or be clarified about LUCS requirements. The new LUCS form is to be implemented for licenses not yet issued upon effective date of the new rules and upon renewal of existing licenses for the 2027 licensing period. It will continue to be only one LUCS form, modified to simply check the corresponding boxes. There will be no additional cost for endorsements beyond the cost of a new LUCS when/if changes to the operation or location of a business would otherwise require a new LUCS. Please send specific questions to be addressed to hemp@oda.oregon.gov . ○ Please send specific questions regarding requirements and enforcement to hemp@oda.oregon.gov . ○ Please send specific questions regarding unclear standards or timelines to hemp@oda.oregon.gov . <p>Please send specific questions to be addressed to hemp@oda.oregon.gov .</p>
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	<p>However, several provisions would benefit from clarification to avoid unintended consequences, inconsistent application, or unnecessary compliance burdens, particularly for farmers and operators acting in good faith. In particular, these comments focus on:</p> <ul style="list-style-type: none"> • Definitions that trigger licensure, testing, or enforcement obligations, where precision is essential to avoid jurisdictional overlap or misclassification of routine agricultural activities; • Land Use Compatibility Statement (LUCS) requirements, where greater clarity around notice, timing, and interim operations would improve predictability without limiting ODA's authority; • Grower and handler endorsements, where overlapping requirements from multiple regulatory regimes warrant clearer guidance on applicability and enforcement; • Pre-registration violations and corrective action, where transparency around standards and timelines would support compliance and fair administration; and • Coordination with OLCC requirements, particularly where licensees are subject to both ODA licensure and downstream registry or tracking obligations. 	
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	<p>Thank you for considering these comments as part of the rulemaking record. I appreciate the Department's continued engagement with stakeholders and welcome ongoing dialogue as the Hemp Program moves forward.</p>	
Josh M.	<p>Thank you for the opportunity to provide public comment on the proposed amendments to OAR Chapter 603, Division 048 governing Oregon's industrial hemp program.</p> <p>I am submitting these comments as a licensed hemp handler engaged in Oregon's hemp sector, with a focus on practical compliance, economic viability, and regulatory clarity. My operation is based in Washington County and I have operated under ODA licensure since 2019 and I work directly with multiple licensed operators across the state. Like many operators, I am committed to operating within a strong, science-based regulatory framework that protects public interests while remaining workable for agricultural producers and small- to mid-scale businesses.</p> <p>I recognize the Department's responsibility to implement statutory mandates under ORS 571.260-571.348 and appreciate the complexity of administering a program that sits at the intersection of agriculture, land use, testing,</p>	<p>It is important to us that all licensees and potential licensees understand the requirements and how to comply. To help us better understand and address your concerns, please review the notes below and provide specific questions for each point listed.</p> <ul style="list-style-type: none"> ○ We are diligently working to identify definitions which need clarification. Please contact hemp@oda.oregon.gov to specify definitions which you believe need further clarification, providing specific questions to be answered by a revision. ○ More information is needed to ensure that we understand what needs to change or be clarified about LUCS requirements. The new LUCS form is to be implemented for licenses not yet issued upon effective date of the new rules and upon renewal of existing licenses for the 2027 licensing period. It will continue to be only one LUCS form, modified to simply check the corresponding boxes. There will be no additional cost for endorsements beyond the cost of a new LUCS when/if changes to the operation or location of a business would otherwise require a new LUCS. Please send specific questions to be addressed to hemp@oda.oregon.gov .



<p>and enforcement. Oregon's hemp sector depends on rules that are clear, predictable, and aligned with both statutory authority and real-world agricultural practices. Where ambiguity exists, it can create compliance risk not only for licensees, but also for the Department's inspectors and enforcement staff.</p> <p>As drafted, many of the proposed amendments move the program toward greater structure and consistency. However, several provisions would benefit from clarification to avoid unintended consequences, inconsistent application, or unnecessary compliance burdens, particularly for farmers and operators acting in good faith. In particular, these comments focus on:</p> <ul style="list-style-type: none"> • Definitions that trigger licensure, testing, or enforcement obligations, where precision is essential to avoid jurisdictional overlap or misclassification of routine agricultural activities; • Land Use Compatibility Statement (LUCS) requirements, where greater clarity around notice, timing, and interim operations would improve predictability without limiting ODA's authority; • Grower and handler endorsements, where overlapping requirements from multiple regulatory regimes warrant clearer guidance on applicability and enforcement; 	<ul style="list-style-type: none"> ○ Please send specific questions regarding requirements and enforcement to hemp@oda.oregon.gov . ○ Please send specific questions regarding unclear standards or timelines to hemp@oda.oregon.gov . <p>Please send specific questions to be addressed to hemp@oda.oregon.gov .</p>
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Emily G.	<p>I write to you urging you not to adopt the new hemp rules as currently written. Writing as a farmer running an industrial hemp business, the proposed updates will decrease our market access and have a significant negative economic impact our farm. I am concerned about how this will negatively impact our business, but also for Oregonians to get access to quality hemp derived products. Moreover, the rules concerning seed production and sales as currently written, will limit the access of Oregonians to legally purchase seeds to legally grow their own plants under current Oregon law. A major component of legalization in Oregon was ensuring safe legal access to these plants, and the proposed amendments are a huge step backwards for Oregonians.</p>	<p>It is important to us that all licensees and potential licensees understand the requirements and how to comply. There are no amendments in this current proposal which change access to seeds; rather there is clarification of prior existing statutes which were not plainly stated in OARs.</p> <p>To help us better understand and address your concerns, please send questions about specific rules to hemp@oda.oregon.gov .</p>



	<p>Please reconsider these amendments as they will only hurt the few remaining farmers in Oregon, and the Oregonians that rely on these plants in their backyards.</p>	
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